

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO.</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED :</b>
<b>MARK HILL</b>	<b>:</b>	<b>VIOLATION :</b>
	<b>:</b>	<b>18 U.S.C. § 1343 (wire fraud - 1 count)</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

**THE SCHEME**

1. From in or about April 2001 through in or about June 2003, defendant

**MARK HILL**

devised and intended to devise a scheme to defraud Gateway, Inc., Dell Computer Corp., Citibank, MBNA, Providian Bank, Household Bank, American Express, B.P. Oil Co., Capital One Bank, Visa Aspire (Columbus Bank and Trust Co.), Shell Oil Co., Chase Manhattan Bank, employees and spouses of the Aberdeen Federal Proving Grounds Credit Union (Aberdeen) and J.N., and to obtain money and property by means of false and fraudulent pretenses, representations and promises.

**MANNER AND MEANS**

It was part of the scheme that:

2. Defendant Mark HILL, without permission, would use the identities of other individuals, including at various times their names, social security numbers and other personal information, to apply for credit and/or credit cards in the names of those individuals.

Defendant HILL would then use those credit cards or credit to obtain or attempt to obtain cash, merchandise or other products. When defendant HILL was successful in obtaining credit, he would default on payment to the credit card company.

3. From in or about April 2001 through in or about November 2001, defendant MARK HILL applied for and used a credit card from Providian Bank, in the name of individual M.S., using defendant HILL's own address and social security number, to obtain approximately \$746 in cash and purchases for which he did not pay Providian.

4. From in or about April 2001 through in or about January 2002, defendant MARK HILL applied for and used a credit card from BP Oil Co., issued by Citibank, in the name of J.W.N., using defendant HILL's own address and social security number, in order to obtain approximately \$569.06 in cash and purchases for which he did not pay BP Oil Co. or Citibank.

5. From in or about October 2001 through in or about March 2002, defendant MARK HILL applied for and used a credit card from Aspire Visa, issued by Columbus Bank and Trust Company, in the name of D.P., using defendant HILL's own address and social security number, in order to obtain approximately \$1,797.77 in cash, merchandise and insurance for which he did not pay Aspire Visa or Columbus Bank and Trust Company.

6. In or about November 2001, defendant MARK HILL applied for and used a credit card from Shell Oil Co., issued by Citibank, in the name of D.P., using defendant HILL's own address and social security number, in order to obtain approximately \$24.50 in cash for which he did not pay Shell Oil Co. or Citibank.

7. In or about May 2003, defendant MARK HILL, without permission,

removed documents which contained names, social security numbers, spouse's names and social security numbers, and addresses of approximately 138 employees of Aberdeen from the offices of Principal Financial Company, Radnor, Pennsylvania. Defendant HILL used this personal information to apply for credit and credit cards and to attempt to purchase merchandise.

8. In or about April 2003, defendant MARK HILL, without permission, applied for a Discover credit card for himself from Chase Manhattan Bank, using the name and social security number of Aberdeen employee L.M.

9. On or about May 19, 2003, defendant MARK HILL, without permission, applied through the internet for credit for himself in the amount of \$4,787 for the purchase of products from Gateway, using the name and social security number of E.R., the spouse of an Aberdeen employee.

10. On or about May 20, 2003, defendant MARK HILL, without permission, applied through the internet for credit for himself for the purchase of products from Gateway, to be financed by Citibank, using the name and social security number of Aberdeen employee C.T.

11. On or about May 20, 2003, defendant MARK HILL, without permission, applied through the internet for credit for himself in the amount of \$7,500 for the purchase of products from Gateway, to be financed by Citibank, using the name and social security number of Aberdeen employee B.S.

12. On or about May 20, 2003, defendant MARK HILL, without permission, applied for credit for himself from Dell Computer Company, and credit cards for himself from Discover, American Express, and NCB Card Services, using the name and social security number of Aberdeen employee J.R.

13. On or about May 21, 2003, defendant MARK HILL, without permission, applied through the internet for credit for himself in the amount of \$5,500 for the purchase of products from Gateway, to be financed by MBNA, using the name and social security number of Aberdeen employee J.R.

14. On or about May 21, 2003, defendant MARK HILL, without permission, applied through the internet for credit for himself for the purchase of products from Gateway, to be financed by MBNA, using the name and social security number of Aberdeen employee K.A.S.

15. On or about May 21, 2003, defendant MARK HILL, without permission, applied through the internet for credit for himself in the amount of \$7,500 for the purchase of products from Gateway, to be financed through MBNA, using the name and social security number of Aberdeen employee S.S.

16. On or about June 15, 2003, defendant MARK HILL, without permission, applied through the internet for credit for himself for the purchase of products from Gateway, using the name and social security number of Aberdeen employee P.S.

17. On or about June 15, 2003, defendant MARK HILL, without permission, applied for an American Express card for himself, using the name and social security number of Aberdeen employee M.S.

18. On or about June 19, 2003, defendant MARK HILL, without permission, applied through the internet for credit for himself in the amount of \$5,000 for the purchase of products from Gateway, using the name and social security number of B.M., the spouse of an Aberdeen employee.

19. On or about May 21, 2003, at Philadelphia, in the Eastern District of

Pennsylvania, defendant

**MARK HILL,**

for the purpose of executing the scheme described above, caused to be transmitted by means of wire communication in interstate commerce signals and sounds, that is, an internet transmission from Philadelphia to a Gateway server in Colorado, using the name and social security number of S.S. to apply for \$7,500 in credit for purchases of Gateway products.

In violation of Title 18, United States Code, Section 1343.

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**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

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**PATRICK L. MEEHAN**  
**UNITED STATES ATTORNEY**